

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

SHAMARA T. KING,  
on behalf of herself and all others  
similarly situated  
  
Plaintiff,  
vs.  
GENERAL INFORMATION SERVICES, INC.,  
  
Defendant.

C.A. No. 10-6850

CLASS ACTION

**FILED**

FEB 20 2013

MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

JOINT PROPOSED SCHEDULING ORDER

Following a conference with the Court pursuant to Federal Rule of Civil Procedure 16, counsel for the Plaintiff and Defendant hereby submit this Joint Proposed Scheduling Order.

1. All discovery regarding the merits of Plaintiff's claims and the requirements of Fed. R. Civ. P. 23, but excluding discovery regarding individual transactions of absent putative class members, shall be completed by July 1, 2013;
2. Expert Discovery Schedule
  - a. The parties shall disclose any affirmative experts related to the merits of Plaintiff's claims and the requirements of Fed. R. Civ. P. 23, if any, as well as the subject matter of the expected expert testimony, by April 1, 2013 with affirmative expert reports to be served by April 15, 2013 and depositions of such experts shall be completed by May 20, 2013; and
  - b. Rebuttal Expert Reports related to the merits of Plaintiff's claims and the requirements of Fed. R. Civ. P. 23, if any, shall be served by June 20, 2013 (no party is required to proffer an affirmative expert in order to proffer an expert report for the sole purpose of rebutting the other party's affirmative expert report) and depositions of such experts shall be completed by July 1, 2013.
3. Class Certification Schedule
  - a. Motion for Class Certification by July 15, 2013;
  - b. Response to Motion for Class Certification within 40 days after service of the Motion for Class Certification;

- c. Reply to Motion for Class Certification within 21 days after service of Defendant's Response to the Motion for Class Certification.
4. If a class is certified, the parties shall meet and confer and, if necessary, shall have a status conference with the Court, regarding the sending of class notice and the completion of discovery and disclosure of experts for class merits litigation.
5. Further scheduling is to abide the Court's disposition of any Motion for Class Certification.

Respectfully submitted,  
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**APPROVED AND SO ORDERED:**

Date: 2/19/13

  
PETRESE B. TUCKER, U.S.D.J.